



THE LAW FIRM OF HUGH H. MO, P.C.

225 BROADWAY, 27TH FL.
NEW YORK, NEW YORK 10007
www.hhmolaw.com

TEL (212) 385-1500
FAX (212) 385-1870

August 27, 2024

VIA ECF

Honorable Diane Gujarati
United States District Judge Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Qingdao Zhongfu International Logistics Co., Ltd. v. Hop Wo Int'l Trading, Inc.,
Yat Wo Trading Inc., and Yao Yua Li*, Case No. 24-cv-00739 (DG) (VMS)

Dear Judge Gujarati:

We are the attorneys for Hop Wo International Trading, Inc. (“Hop Wo”), Yat Wo Trading Inc. (“Yat Wo”), and Yao Yua Li (T/N: Yaohua Li) (collectively, the “Defendants”) in the above-referenced matter. On May 12, 2025, the Court granted the parties’ first request to extend discovery to August 28, 2025 (Dkt. No. 24). Pursuant to the Court’s Individual Practice Rules, Rule I(F), we respectfully request a 150-day extension, as follows:


	Current Deadline	Extended Deadline
Fact Discovery	August 28, 2025	Monday, January 26, 2026
Expert Discovery Initial Disclosures	September 15, 2025	February 12, 2026
All Discovery	November 26, 2025	April 25, 2026

Good cause exists for an extension of the discovery deadline because additional time is necessary for further document exchange and because the parties have been engaged in good faith discussions to schedule depositions for several weeks but ultimately disagree as to the location of Plaintiff’s deposition, whose place of business and residence is in China. The parties conferred and will submit a separate letter motion pursuant to Local Rule 37.2 to request a pre-motion discovery conference to resolve the dispute. Additional time is also necessary if the discovery dispute is not resolved at conference and briefing is necessary.

This is the parties’ second extension request and there have been no denials. The parties conferred and Plaintiff’s counsel consents to our request for an extension of discovery deadlines.

We thank the Court for its courtesy and kind consideration.

Respectfully submitted,



Hin Ton Wong

cc: All Counsel (via ECF)